

The WISP industry serves a vital function in providing communications connectivity to many underserved communities. Underserved is perhaps a more politic way of saying that larger telecommunications concerns are less interested in providing service because of the low customer density. In the rural areas of California, customers have waited patiently for years for broadband data services to arrive via DSL or cable technologies. These services have expanded very slowly and are only available in a few core areas. Wireless broadband connectivity has stepped up to fill that gap. The main factor in making this possible is the availability of license free spectrum, allowing the deployment of networks within the financial means of small business.

The proposed rule to allow unlicensed operation in the television broadcast bands would be a huge positive adjustment in the equation governing how rural customers are provided with broadband service. In many areas of the underserved communities, topography and vegetation of rolling hills and many forested areas are the most important factor in the deployment and eventual cost of a wireless broadband networks. The lower frequencies available in unused television spectrum would be a huge improvement in propagation quality for these areas. The effect would allow service to be offered more rapidly and at lower cost to broadband customers. Ironically and perhaps fortuitously, the same topography that would make this spectrum useful for data communications, makes it unlikely that the television broadcasts from the urban centers are viable. Many if not most residents receive television service from satellite broadcast.

In support of the proposed FCC rule, I would point out that thousands of independently operated Wireless Internet Service Providers cannot afford to bid for spectrum to provide better service for their current and future customers. But like small businesses throughout the United States, which provide the main force of economic growth, small broadband communications businesses provide the motive force for continued expansion of the information revolution to the American public. The overall economic benefit of connecting rural residents to broadband communications may not be fully evident for many years to come. However, our customers believe it is of immediate benefit to have access to these services now. Allowing unlicensed access to unused television spectrum will greatly help the WISP industry meet that demand.

Respectfully,

Daniel Cooper  
Backwoods Broadband